

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THERESA PIEKARSKI, on behalf of)	
herself and all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 12-cv-07346
v.)	
)	Magistrate Judge Schenkier
AMEDISYS ILLINOIS, LLC, and)	
AMEDISYS HOLDING, LLC,)	
)	
Defendants.)	

**UNOPPOSED MOTION TO CERTIFY A COLLECTIVE ACTION
UNDER SECTION 216(b) OF THE FLISA SOLELY FOR SETTLEMENT
PURPOSES; FOR APPROVAL OF AN OPT-IN SETTLEMENT; FOR
APPOINTMENT OF SETTLEMENT ADMINISTRATOR; AND FOR APPROVAL
OF AWARDS OF ATTORNEYS' FEES AND COSTS AND SERVICE AWARDS**

Named Plaintiff Theresa Piekarski and Opt-in Plaintiffs Edward Thelen and Radha Godambe, through their Counsel, respectfully move this Court, consistent with the parties' Stipulation and Settlement Agreement (the "Settlement Agreement") to:

- (a) Certify this case as a collective action pursuant to Section 216(b) of the Fair Labor Standards Act ("FLSA") solely for purposes of the parties' proposed settlement;
- (b) Approve the opt-in settlement reached between Plaintiffs and Defendants Amedisys Illinois, LLC and Amedisys Holding, LLC in this matter, as set forth in the Settlement Agreement submitted herewith, including authorizing the issuance of notice to the Settlement Class defined therein;
- (c) Appoint Dahl Administration as the neutral, third-party Settlement Administrator for purposes of issuing notice of the settlement, collecting required consent and

tax forms, distributing settlement payments, and performing the other tasks specified in the parties' Settlement Agreement;

- (d) Authorize an award of Plaintiffs' Attorneys' Fees from the Gross Settlement Amount, as defined in the Settlement Agreement, in the amount of \$250,000 and an award of Plaintiffs' Litigation Expenses from the Gross Settlement Amount in the amount of \$10,495; and
- (e) Authorize Service Awards, as defined in the Settlement Agreement, of \$15,000.00 for Named Plaintiff Theresa Piekarski and of \$2,500.00 each for Opt-in Plaintiffs Edward Thelen and Radha Godambe.

In support of this unopposed motion, Plaintiffs also submit the accompanying memorandum of law. The proposed Settlement Agreement, proposed Notice of Settlement, and a proposed order approving the same are attached to the accompanying memorandum of law.

Plaintiff and Opt-in Plaintiffs have conferred with Defendants and, consistent with their agreement in the parties' Settlement Agreement, Defendants do not oppose the instant motion.

Dated: July 28, 2016

Respectfully submitted,

For Plaintiffs:
s/Maureen A. Salas
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